

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No. 2:19 CR 159
)	Judge Philip P. Simon
SAMANTHA ELHASSANI,)	
)	
Defendant.)	

DEFENDANT’S UNOPPOSED MOTION TO CONTINUE SENTENCING HEARING

Defendant, **SAMANTHA ELHASSANI**, by and through her attorneys, **THOMAS ANTHONY DURKIN** and **JOSHUA G. HERMAN**, respectfully moves this Court, pursuant to the Due Process and Effective Assistance of Counsel provisions of the Fifth and Sixth Amendments to the Constitution of the United States, to continue the date of the sentencing hearing, which is presently scheduled for March 5, 2020, to March 30, 2020.

In support of this motion, Defendant, through counsel, shows to the Court the following:

1. On November 25, 2019, Defendant pled guilty to a one-count information charging a violation of 18 U.S.C. §2339C(c)(2)(A). That plea was made pursuant to a written plea agreement. (Dkt. #2). Sentencing was then scheduled for March 5, 2020. (Dkt. #6).
2. Counsel for Defendant respectfully request a short continuance to accommodate their ongoing investigation; their need to consult with Defendant, who is in custody; and their preparation of the response to the Draft PSR, which is presently due on February 12, 2020.
3. The government does not oppose this request for a continuance.

4. The parties have conferred and would request that the sentencing be continued from March 5, 2020 to March 30, 2020, which the parties understand is available and convenient for the Court.

5. This request is made in good faith and not for the purposes of delay.

WHEREFORE, Defendant respectfully requests that her sentencing presently set for March 5, 2020 be continued by to a date that is convenient for the Court, namely March 30, 2020, and that all filing deadlines be continued accordingly.

Respectfully submitted,

/s/ Thomas Anthony Durkin
THOMAS ANTHONY DURKIN,

/s/ Joshua G. Herman
JOSHUA G. HERMAN
Attorneys for Defendant

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CERTIFICATE OF SERVICE

Joshua G. Herman, Attorney at Law, hereby certifies that the foregoing Defendant's Unopposed Motion to Continue Sentencing Hearing was served on February 8, 2020, in accordance with Fed.R.Crim.P.49, Fed.R.Civ.P.5, LR 5.5, and the General Order on Electronic Case Filing (ECF) pursuant to the district court's system as to ECF filers.

/s/ Joshua G. Herman
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